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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

MISTY CASTILLO, as Personal Representative of the ESTATE OF ARCADIO CASTILLO, III, Plaintiff, v. NATHAN BUSH and CITY OF SALEM, a municipal corporation, Defendants.	Case No. 6:22-cv-00684-MK JOINT MOTION FOR TEMPORARY STAY OF PROCEEDINGS AND EXTENSION OF CASE MANAGEMENT DEADLINES
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RULE 7-1 CERTIFICATE OF COMPLIANCE

The attorneys for all parties to this case have conferred and are in agreement regarding the subject matter of the within motion.

MOTION

Plaintiff and Defendants jointly move this Court for (1) a temporary stay of proceedings from September 6, 2024 to October 25, 2024 and (2) an order extending the case management deadlines established by Order, ECF 80, as follows:

	<u>Current Date</u>	<u>Requested Date</u>
Joint ADR Report	September 16, 2024	November 15, 2024
Expert witness disclosures	October 14, 2024	December 23, 2024

THIS JOINT MOTION supported by Declaration of David D. Park, filed contemporaneously herewith, is made to preserve the procedural status quo, inclusive of a stay of the running of the time required to give notice of appeal of this court's rulings on qualified immunity set forth in its Opinion & Order dated August 15, 2024, ECF 117, in order to facilitate further efforts of the parties to resolve the case through mediation scheduled for October 21, 2024. "The power to stay proceedings is incidental to the power inherent in every court to control the disposition of the causes on its docket with economy of time and effort for itself, for counsel, and for litigants." *Landis v. North America Co.*, 299 U.S. 248, 254 (1936). "A court may issue a stay of proceedings in the interests of efficiency and fairness when a pending resolution of independent proceedings bears upon the case." *Flores v. Bennett*, 675 F.Supp.3d 1052, 1060 (E.D. Cal. 2023) (internal quotation marks and citation omitted).

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DATED: August 23, 2024.

By: s/ David D. Park
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(Mr./he/him)
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